



City of Santa Barbara
Parks and Recreation Department

Memorandum

DATE: June 16, 2009

TO: Creeks Restoration/Water Quality Improvement Program
Citizen Advisory Committee

FROM: Autumn Malanca, Water Resources Specialist

SUBJECT: STORM WATER MANAGEMENT PROGRAM STATUS REPORT

COMMITTEE DIRECTION – FOR DISCUSSION

That the Committee receive a status report on the City's Storm Water Management Program.

DISCUSSION

The Clean Water Act National Pollutant Discharge Elimination System (NPDES) Phase II regulations govern storm water discharges from municipalities that operate storm drain systems. Under California law, the State Water Resources Control Board (Water Board) and its regional agencies are responsible for implementation of NPDES regulations. In response to these requirements, the City of Santa Barbara prepared a Storm Water Management Program (SWMP) designed to reduce the discharge of pollutants to protect water quality. The SWMP defines guidelines and requirements (best management practices or "BMPs") for the protection of water quality and the reduction of pollutant discharges. The Creeks Division has provided overall coordination and administration of the SWMP since preparation of the program began in 2003. SWMP implementation and compliance is a city-wide requirement.

In January 2009, the Water Board approved the SWMP after numerous revisions and informal implementation over the past five years. This approval kicked off "Year 1" (of the 5 years covered by the SWMP) of formal City SWMP implementation and annual reporting is now required. Creeks staff administrated quarterly reporting throughout 2009 with all of the City departments and divisions that are responsible for implementing and reporting on specific storm water BMPs. The City's first Annual Report for Year 1 of SWMP implementation was compiled and submitted to the Water Board before the April due date.

City of Santa Barbara SWMP Annual Report – Year 1

The City's SWMP contains six program elements that require BMP implementation and annual reporting. These program elements are referred to as "Minimum Control Measures" (MCM). They represent the following sections (implemented primarily by the City departments and divisions in parentheses) in the SWMP Annual Report:

1. Public Education and Outreach (Creeks)
2. Public Participation/Involvement (Creeks)
3. Illicit Discharge Detection and Elimination (Creeks, Water Resources, GIS, Building and Safety, Facilities, and Parks)
4. Construction Site Storm Water Runoff Control (Building and Safety)
5. Post Construction Storm Water Management (Community Development, Building and Safety, Public Works, Creeks)
6. Pollution Prevention/Good Housekeeping for Municipal Operations (Streets, Water Distribution, Wastewater, Parking, Facilities, Parks, Golf, Fire, Motor Pool, Creeks)

There are 111 specific BMPs identified in the SWMP under the elements listed above. The Annual Reporting effort includes gathering reports confirming BMP implementation from 13 department and division managers and staff, as well as several Creeks Division staff. Summary reports and supporting documentation is submitted quarterly, including purchase orders, invoices, inspection reports, outreach ads, data spreadsheets, monitoring reports, and sign in sheets for required trainings. This reporting process and supporting documentation resulted in a large report that documents the City's commitment to protecting and improving surface water quality.

The annual reporting requirements include a Program Effectiveness Assessment, which is attached as the final section (Section 9) of the City's 2009 Annual Report. The California Storm Water Quality Association (CASQA) developed this approach which the Water Board subsequently adopted as a requirement for all SWMP Annual Reports. The purpose of the assessment is to confirm the desired results of municipal SWMP programs and identify modifications that may be needed, thus ensuring the iterative process is used as an effective management tool throughout the permit implementation. The Effectiveness Assessment rates each BMP with "outcome levels" to help categorize and describe the desired results of the program as well as identify needed modifications.

MCM 1: Public Education and Outreach

The Creeks Division SWMP responsibilities primarily lie in the areas of Public Education, Public Participation and Illicit Discharge Detection and Elimination. The BMPs in MCM 1 are designed to educate community members about steps they can take both at work and at home to prevent and reduce water pollution. All of the Public Education BMPs were successfully implemented and found to be effective in 2009. In fact, the City is ahead of schedule with business outreach. Mobile washers were added to the Clean Water Business Program in 2008-09, and the SWMP does not require the

program to expand to this business sector until Year 3 (2011). Twenty one businesses (restaurants, automotive businesses, and mobile washers) were inspected and certified as Clean Water Businesses in Year 1. Furthermore, in 2009 a workshop was held that specifically targeted mobile washing businesses and demonstrated proper wash water capture and containment.

MCM 2: Public Participation and Involvement

The Public Participation and Involvement MCM is intended to foster active community support for the SWMP, which in turn ensures that the program reflects community values and priorities and thus has the highest potential for success. All of the Public Participation and Involvement BMPs were successfully implemented and found to be effective in 2009. The Creeks Advisory Committee meetings are part of this MCM in order to keep the public informed about outreach efforts, creek restoration projects and water quality issues and efforts. Other BMPs include stakeholder meetings, regional coordination (intergovernmental meetings), the City's annual community forum on water quality issues, as well as community volunteer projects (such as creek clean-ups and storm water monitoring) all work together to establish a successful Public Participation and Involvement program.

MCM 3: Illicit Discharge Detection and Elimination

The BMPs in the Illicit Discharge Detection and Elimination MCM work collectively to effectively reduce pollution in storm water by working to identify and eliminate sources of illicit discharges and illegal dumping. This part of the City's program depends on participation from the public and other City Departments. While this is an effective approach, it does present challenges as the public and other City departments often have competing priorities and different mandates. BMP 3.3 calls for adopting a storm water ordinance by Year 3, which will require a large amount of interdepartmental coordination and public review.

2009 demonstrated a focus on enforcing the water quality sections of the City's Municipal Code (Chapter 16.15; Urban Pollution Controls, Non-Point Source Discharge Restrictions). A total of 181 enforcement calls were received and responded to during 2009. The Creeks Division hired a new full-time employee in 2009 who is dedicated to enforcement response. This was an improvement to the previous staffing level, in which two employees shared enforcement response. Furthermore, Creeks Division staff produced new response cards which allow illicit discharge reporters the opportunity to provide feedback and program suggestions to the Creeks Division. This existing Municipal Code and other related City ordinances, goals, and policies were reviewed in Year 1 (referred to as the City's Storm Water Ordinance Audit) to determine the need for an ordinance update and identify inconsistencies with the City's SWMP, Storm Water BMP Guidance Manual, and/or the NPDES Phase II regulations. Public workshops and hearings will be held in Years 2 and 3 (2010 and 2011) to determine the next steps in addressing the identified inconsistencies of the Year 1 audit and/or the need for a new storm water ordinance. This process (BMP 3.3) is not only effective at raising the awareness of storm water quality issues and requirements, but it can also

ultimately change behaviors by providing the appropriate enforcement mechanisms to do so.

MCM 4: Construction Site Storm Water Runoff Control

The Construction Site Storm Water Runoff Control MCM is implemented and enforced under authority of the City's Building Division, through City code, policy, and practice. Collectively, the BMPs in the City's SWMP related to construction site storm water runoff were found to be effective in the City's 2009 Annual Report. Evaluating the current erosion and sediment control policy and the municipal ordinance for erosion and sediment control requirements (BMPs 4.1 and 4.2) will demonstrate in future years whether or not the City has adequate regulations in place to control pollutants from construction sites.

The Building Division proposed a modification to BMP 4.6, which originally required that the number of erosion/sediment control violations be reduced by 10% annually. Building staff proposed, instead, to provide information to the contractors, architects, engineers, designers, etc. in the form of an e-mail to the local American Institute of Architects (AIA), Santa Barbara Contractors Association, and also in an existing Land Development Team (LDT) e-mail bulletin. Building staff believes that if contractors get the information electronically, they can review, distribute, and learn from at their convenience and in a time frame that fits into their schedule. Building staff also feels this approach is more likely to be effective due to the fact many contractors in the field who are installing erosion control devices would not be allowed or encouraged by their employers to leave the site for training. The information would be sent to the various organizations on an annual basis and include links to helpful websites.

MCM 5: Post-Construction Storm Water Management

Creeks Division staff also assists other city staff in incorporating Post Construction Storm Water Management designs into proposed development and redevelopment projects. However, the Community Development Department is the main City department that focuses on post-construction storm water management. This MCM requires the design and implementation of specific infiltration and/or water capture BMPs into development and redevelopment within the City (bioswales, infiltration designs, rain barrels, etc.) for compliance with the SWMP's runoff volume, rate, and water quality treatment requirements. The City's post-construction storm water requirements are explained in detail in the City's Storm Water BMP Guidance Manual, produced and finalized in 2008. This MCM and Guidance Manual will continue to evolve over the next several years with development and implementation of hydromodification control criteria; a current topic among the State Water Board, the regional water quality control boards, and municipalities.

Creeks Division staff have become intimately familiar with the SWMP requirements and BMP designs in the Guidance Manual, but other City staff had not until Year 1. Staff trainings were offered and very well attended in 2009. Creeks staff remains directly involved in the development review process and will monitor whether additional,

focused or revised post-construction storm water management training for City staff is needed. Thirty City projects implemented post-construction BMP designs in Year 1 and it is anticipated that this number will increase in following years as staff become more adept at implementing SWMP requirements and tracking this new requirement. In order to ensure project SWMP compliance and better track its project implementation, staff was directed at the end of Year 1 to display SWMP compliance BMPs on building permit plans and to include this activity in the City's "Tidemark" computer tracking system.

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

The Municipal Operations Pollution Prevention portion of the Storm Water Management Program is intended to ensure that City operations and the delivery of public services occurs in a manner that protects storm water quality and serves as a good example for the community. The 2009 Annual Report demonstrates that collectively, the BMPs within the municipal operations component of the City's SWMP are effective in increasing awareness among City staff in order to change behavior and ultimately to reduce pollution. Year 1 facility inspections (BMP 6.20) proved successful in documenting City staff's commitment to storm water pollution prevention. There were a few deficiencies noted at the City's Annex Yard (managed by the Streets Division) and the Parks Corporation Yard (managed by the Parks Department). These deficiencies include issues with wash water, drainage, and storage; all of which can and will be addressed in Year 2. These efforts to rectify deficiencies will result in a behavior change and pollutant load reduction, which is the intention of these ongoing inspections.

Street sweeping is a large City investment in good housekeeping practices that demonstrates a measurable benefit in reducing pollutant loads. Over 2,300 tons of debris was collected through the street sweeping program in Year 1. It is anticipated that these collected loads may increase in future years due to the City's current endeavor of installing debris screens on all catch basin inlets. The screens serve as a barrier to trash and landscaping debris during dry weather that would normally fall into the catch basin and storm drain system. These screens require little/no maintenance, as opposed to the older approach of catch basin inserts, and they work hand-in-hand with the existing street sweeping program. The screens are scheduled to be installed throughout the City in Year 2.

Next Steps

The City is six months into Year 2 of formal SWMP implementation and reporting requirements. The coordination effort is large with 13 departments and divisions implementing and tracking over 100 required BMPs and measurable goals. City staff is becoming familiar with these new tracking and reporting requirements. Despite this learning curve, the City is on track to meet the annual SWMP reporting requirements.

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